

PUBLIC SUBMISSION

As of: October 27, 2014 Received: October 21, 2014 Status: Posted Posted: October 23, 2014 Tracking No. 1jy-8f1s-si2g Comments Due: October 25, 2014 Submission Type: Web
--

Docket: EPA-HQ-OPP-2013-0226

Petition to Establish Tolerances for Chemical Flupyradifurone - First Food Use

Comment On: EPA-HQ-OPP-2013-0226-0007

Public Participation Memorandum for New Active Ingredient Flupyradifurone

Document: EPA-HQ-OPP-2013-0226-0028

Comment submitted by D. Walsh

Submitter Information

General Comment

As the integrated pest management coordinator for Washington State University I support the proposed registration of flupyradifurone on crops produced in Washington State. I have direct experience with the product specifically for efficacy against target pests on alfalfa produced as a seed crop and on hops. On hops flupyradifurone has effectively controlled hop aphids in test plots without disrupting beneficial arthropods. Consequently the application of flupyradifurone has not contributed to any secondary outbreaks of secondary pests, specifically spider mites.

My greatest level of experience with flupyradifurone is within the alfalfa grown as a seed crop production system. In small-scale University-based field efficacy trials flupyradifurone has provided effective control of pest Lygus bugs and aphids. Subsequently we have completed 3 years of studies in which we have exposed cohorts of the 2 main species of managed non-honey bee pollinators to flupyradifurone. The two species of bees used commercially to pollinate alfalfa produced for seed in the Pacific Northwest include the alfalfa leafcutting bee (*Megachile rotundata*) and the alkali bee (*Nomia melanderi*). In direct topical bioassays as well as bioassays that expose these bees to field aged residues of flupyradifurone the product has proved to

be nontoxic to these two species of bees. Flupyradifurone will provide alfalfa seed (and potentially other seed crop producers) with an extremely effective tool for managing their key insect pests while simultaneously not harming their essential bee pollinators.

Respectfully,

Douglas B. Walsh, Ph.D.

Professor of Entomology

Research Director, Environmental and Agricultural Entomology Laboratory

Coordinator, Integrated Pest Management

Washington State University, Prosser-IAREC

24106 N. Bunn Rd.

Prosser, WA 99350

Email dwalsh@wsu.edu